

UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE

In Re:

W.R. GRACE & CO., et al.,

Debtors.

Chapter 11

NO. 01-01139-KJC
(Jointly Administered)

SUPPLEMENTAL DECLARATION OF JED W. MORRIS

Jed W. Morris, under penalty of perjury of the laws of the States of Washington and Delaware, hereby declares the following to be true and correct:

1. I am over the age of 18 years and am competent to testify to the matters herein and do so on personal knowledge.
2. The lodestar yield for Lukins & Annis's ("L&A") 5,602 hours of time spent on the Barbanti Litigation, ZAI litigation, and Property Damages Creditors' Committee, is \$3,610,897.50, using the rates utilized by Class Counsel.

SUPPLEMENTAL DECLARATION OF JED
W. MORRIS: 1

3. After Mr. Scott's departure, I worked on a number of cases on behalf of L&A that Mr. Scott left unresolved when he left. For example, I was involved in obtaining a release for L&A of the sanctions order against L&A in Mr. Scott's case, *Beck v. Atlantic Coast PLC*, 868 A.2d 840 (2004) ("Beck"). L&A moved for and obtained such relief, having paid the sanctions fine and because Mr. Scott was no longer with L&A. In another case Mr. Scott left with the firm, Mr. Scott had asserted a claim in a multi-district litigation case in Nevada Federal District Court, but had been unable to locate the client for an extended period of time. Mr. Scott would not cooperate with L&A's attempts to obtain information from him on the case or in resolving the issue.

Dated at Spokane, Washington this 12th day of May, 2014.



Jed W. Morris

SUPPLEMENTAL DECLARATION OF JED
W. MORRIS: 2